

Exhibit D

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

FRED HANEY, MARSHA MERRILL)	Civil Action No.
SYLVIA RAUSCH STEPHEN SWENSON,)	
and, ALAN WOOTEN, individually and on)	3:22-cv-00055-REP
behalf of all others similarly situated,)	
)	
Plaintiffs,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
GENWORTH LIFE INSURANCE)	
COMPANY and GENWORTH LIFE)	
INSURANCE COMPANY OF NEW YORK,)	
)	
Defendants.)	
)	
)	
)	
)	
)	

DECLARATION OF OBJECTOR WILLIAM DUDLEY, JR.

I, William Dudley, Jr., hereby aver, pursuant to 28 U.S.C. § 1746, that:

1. I am over the age of 18 years old and am competent to make this declaration, the content of which is true and accurate and is based on my personal knowledge.
2. My class action settlement objections in the above-captioned matter bear ECF numbers 56 and 73.
3. I purchased a Genworth Choice 2 policy, for which I have paid premiums representing a significant investment. I am, therefore, a member of the settlement class the Court preliminarily certified on May 2, 2022 ("Class"). Docket No. 31.
4. I have personal knowledge of the above-captioned lawsuit and the

complexity of the issues involved.

5. Through my attorneys, and with other Objectors, I objected to Plaintiffs' and Defendants' Joint Stipulation of Amended Settlement Agreement (the "Amended Settlement"), which the Court preliminarily approved on July 7, 2022 (Docket No. 34).

6. We brought our Objections to the Court's attention because we wished to make significant improvements to the Amended Settlement.

7. Since receiving notice of the Amended Settlement, we have at all times acted in Class Members' best interest. We have vigorously prosecuted our objections through our attorneys, The Vernia Law Firm and Clinton & Peed.

8. Together, we have worked with our attorneys and Objector Podoll to maximize Class Member benefits: we consulted with our attorneys, reviewed the documents filed on our behalf, and participated in telephone calls and email communications with them.

9. Throughout the course of our attorneys' litigation of our Objections, they updated us on the status of the proceedings and settlement negotiations. Together, we provided our thoughts and input as to the adequacy of any contemplated class-wide relief.

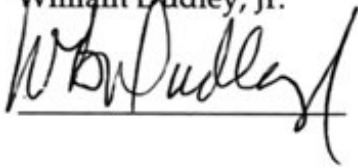
10. The revisions made to the scope of the Amended Settlement are significant and provide all Class members with substantial benefits:

- a. First, the Joint Stipulation increases the Cash Damages Amount to be paid for Class Members in Nonforfeiture (NFO) Status, from \$1,000 to \$1,150.
- b. Second, the Joint Stipulation provides an entirely new option to certain Class Members: they may choose to reduce their Daily /Monthly Benefit Amount (D/M BA) by 25% and receive a cash damages payment of \$1,200.

11. I am satisfied with the efforts of our attorneys and the settlement of our Objections resulting from those efforts. For that reason, I consent to the fees they request.

I declare under penalty of perjury that the foregoing is true and correct.

William Dudley, Jr.

A handwritten signature in black ink, appearing to read "W. Dudley", written over a horizontal line.

Executed December 1, 2022

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INSURANCE COMPANY OF NEW YORK,)	
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Defendants.)	
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DECLARATION OF OBJECTOR LINDA DUDLEY

I, Linda Dudley, hereby aver, pursuant to 28 U.S.C. § 1746, that:

1. I am over the age of 18 years old and am competent to make this declaration, the content of which is true and accurate and is based on my personal knowledge.
2. My class action settlement objections in the above-captioned matter bear ECF numbers 56 and 73.
3. I purchased a Genworth Choice 2 policy, for which I have paid premiums representing a significant investment. I am, therefore, a member of the settlement class the Court preliminarily certified on May 2, 2022 ("Class"). Docket No. 31.
4. I have personal knowledge of the above-captioned lawsuit and the

complexity of the issues involved.

5. Through my attorneys, and with other Objectors, I objected to Plaintiffs' and Defendants' Joint Stipulation of Amended Settlement Agreement (the "Amended Settlement"), which the Court preliminarily approved on July 7, 2022 (Docket No. 34).

6. We brought our Objections to the Court's attention because we wished to make significant improvements to the Amended Settlement.

7. Since receiving notice of the Amended Settlement, we have at all times acted in Class Members' best interest. We have vigorously prosecuted our objections through our attorneys, The Vernia Law Firm and Clinton & Peed.

8. Together, we have worked with our attorneys and Objector Podoll to maximize Class Member benefits: we consulted with our attorneys, reviewed the documents filed on our behalf, and participated in telephone calls and email communications with them.

9. Throughout the course of our attorneys' litigation of our Objections, they updated us on the status of the proceedings and settlement negotiations. Together, we provided our thoughts and input as to the adequacy of any contemplated class-wide relief.

10. The revisions made to the scope of the Amended Settlement are significant and provide all Class members with substantial benefits:

- a. First, the Joint Stipulation increases the Cash Damages Amount to be paid for Class Members in Nonforfeiture (NFO) Status, from \$1,000 to \$1,150.
- b. Second, the Joint Stipulation provides an entirely new option to certain Class Members: they may choose to reduce their Daily /Monthly Benefit Amount (D/M BA) by 25% and receive a cash damages payment of \$1,200.

11. I am satisfied with the efforts of our attorneys and the settlement of our Objections resulting from those efforts. For that reason, I consent to the fees they request.

I declare under penalty of perjury that the foregoing is true and correct.

Linda Dudley

A handwritten signature in black ink, appearing to read "Linda Dudley", written over a horizontal line. The signature is stylized with a large, looping flourish extending to the right.

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Defendants.)	
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DECLARATION OF OBJECTOR DAVID FRIEDMAN

I, Dr. David Friedman, hereby aver, pursuant to 28 U.S.C. § 1746, that:

1. I am over the age of 18 years old and am competent to make this declaration, the content of which is true and accurate and is based on my personal knowledge.
2. My class action settlement objections in the above-captioned matter bear ECF numbers 56 and 73.
3. I purchased a Genworth Choice 2 policy, for which I have paid premiums representing a significant investment. I am, therefore, a member of the settlement class the Court preliminarily certified on May 2, 2022 ("Class"). Docket No. 31.
4. I have personal knowledge of the above-captioned lawsuit and the

complexity of the issues involved.

5. Through my attorneys, and with other Objectors, I objected to Plaintiffs' and Defendants' Joint Stipulation of Amended Settlement Agreement (the "Amended Settlement"), which the Court preliminarily approved on July 7, 2022 (Docket No. 34).

6. We brought our Objections to the Court's attention because we wished to make significant improvements to the Amended Settlement.

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10. The revisions made to the scope of the Amended Settlement are significant and provide all Class members with substantial benefits:

- a. First, the Joint Stipulation increases the Cash Damages Amount to be paid for Class Members in Nonforfeiture (NFO) Status, from \$1,000 to \$1,150.
- b. Second, the Joint Stipulation provides an entirely new option to certain Class Members: they may choose to reduce their Daily /Monthly Benefit Amount (D/M BA) by 25% and receive a cash damages payment of \$1,200.

11. I am satisfied with the efforts of our attorneys and the settlement of our Objections resulting from those efforts. For that reason, I consent to the fees they request.

I declare under penalty of perjury that the foregoing is true and correct.

David Friedman

A handwritten signature in cursive script, appearing to read "David Friedman", written over a horizontal line.

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Defendants.)	
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DECLARATION OF OBJECTOR JAMES PERRY

I, James Perry, hereby aver, pursuant to 28 U.S.C. § 1746, that:

1. I am over the age of 18 years old and am competent to make this declaration, the content of which is true and accurate and is based on my personal knowledge.
2. My class action settlement objections in the above-captioned matter bear ECF numbers 56 and 73.
3. I purchased a Genworth Choice 2 policy, for which I have paid premiums representing a significant investment. I am, therefore, a member of the settlement class the Court preliminarily certified on May 2, 2022 ("Class"). Docket No. 31.
4. I have personal knowledge of the above-captioned lawsuit and the

complexity of the issues involved.

5. Through my attorneys, and with other Objectors, I objected to Plaintiffs' and Defendants' Joint Stipulation of Amended Settlement Agreement (the "Amended Settlement"), which the Court preliminarily approved on July 7, 2022 (Docket No. 34).

6. We brought our Objections to the Court's attention because we wished to make significant improvements to the Amended Settlement.

7. Since receiving notice of the Amended Settlement, we have at all times acted in Class Members' best interest. We have vigorously prosecuted our objections through our attorneys, The Vernia Law Firm and Clinton & Peed.

8. Together, we have worked with our attorneys and Objector Podoll to maximize Class Member benefits: we consulted with our attorneys, reviewed the documents filed on our behalf, and participated in telephone calls and email communications with them.

9. Throughout the course of our attorneys' litigation of our Objections, they updated us on the status of the proceedings and settlement negotiations. Together, we provided our thoughts and input as to the adequacy of any contemplated class-wide relief.

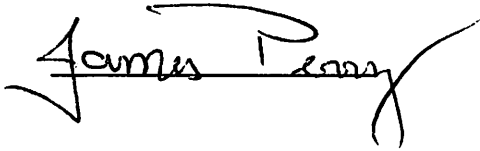
10. The revisions made to the scope of the Amended Settlement are significant and provide all Class members with substantial benefits:

- a. First, the Joint Stipulation increases the Cash Damages Amount to be paid for Class Members in Nonforfeiture (NFO) Status, from \$1,000 to \$1,150.
- b. Second, the Joint Stipulation provides an entirely new option to certain Class Members: they may choose to reduce their Daily /Monthly Benefit Amount (D/M BA) by 25% and receive a cash damages payment of \$1,200.

11. I am satisfied with the efforts of our attorneys and the settlement of our Objections resulting from those efforts. For that reason, I consent to the fees they request.

I declare under penalty of perjury that the foregoing is true and correct.

James Perry

A handwritten signature in black ink that reads "James Perry". The signature is written in a cursive style with a large, sweeping "J" and a long, horizontal stroke extending to the right.

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Defendants.)	
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DECLARATION OF OBJECTOR MICHAEL PODOLL

I, Michael Podoll, hereby aver, pursuant to 28 U.S.C. § 1746, that:

1. I am over the age of 18 years old and am competent to make this declaration, the content of which is true and accurate and is based on my personal knowledge.
2. My class action settlement objections in the above-captioned matter bear ECF number 48.
3. I purchased a Genworth Choice 2 policy, for which I have paid premiums representing a significant investment. I am, therefore, a member of the settlement class the Court preliminarily certified on May 2, 2022 ("Class"). Docket No. 31.
4. I have personal knowledge of the above-captioned lawsuit and the

complexity of the issues involved.

5. Through my attorneys, and with other Objectors, I objected to Plaintiffs' and Defendants' Joint Stipulation of Amended Settlement Agreement (the "Amended Settlement"), which the Court preliminarily approved on July 7, 2022 (Docket No. 34).

6. We brought our Objections to the Court's attention because we wished to make significant improvements to the Amended Settlement.

7. Since receiving notice of the Amended Settlement, we have at all times acted in Class Members' best interest. We have vigorously prosecuted our objections through our attorneys, The Vernia Law Firm and Clinton & Peed.

8. Together, we have worked with our attorneys and Objector Podoll to maximize Class Member benefits: we consulted with our attorneys, reviewed the documents filed on our behalf, and participated in telephone calls and email communications with them.

9. Throughout the course of our attorneys' litigation of our Objections, they updated us on the status of the proceedings and settlement negotiations. Together, we provided our thoughts and input as to the adequacy of any contemplated class-wide relief.

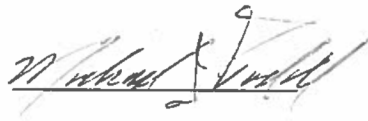
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- b. Second, the Joint Stipulation provides an entirely new option to certain Class Members: they may choose to reduce their Daily /Monthly Benefit Amount (D/M BA) by 25% and receive a cash damages payment of \$1,200.

11. I am satisfied with the efforts of our attorneys and the settlement of our Objections resulting from those efforts. For that reason, I consent to the fees they request.

I declare under penalty of perjury that the foregoing is true and correct.

Michael Podoll

A handwritten signature in black ink, appearing to read "Michael Podoll", written over a horizontal line.

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DECLARATION OF OBJECTOR THOMAS TOMAN

I, Thomas Toman, hereby aver, pursuant to 28 U.S.C. § 1746, that:

1. I am over the age of 18 years old and am competent to make this declaration, the content of which is true and accurate and is based on my personal knowledge.
2. My class action settlement objections in the above-captioned matter bear ECF numbers 56 and 73.
3. I purchased a Genworth Choice 2 policy, for which I have paid premiums representing a significant investment. I am, therefore, a member of the settlement class the Court preliminarily certified on May 2, 2022 ("Class"). Docket No. 31.
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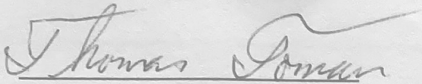
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- b. Second, the Joint Stipulation provides an entirely new option to certain Class Members: they may choose to reduce their Daily /Monthly Benefit Amount (D/M BA) by 25% and receive a cash damages payment of \$1,200.

11. I am satisfied with the efforts of our attorneys and the settlement of our Objections resulting from those efforts. For that reason, I consent to the fees they request.

I declare under penalty of perjury that the foregoing is true and correct.

Thomas Toman

A handwritten signature in cursive script that reads "Thomas Toman". The signature is written in dark ink and is positioned below the printed name.

Executed December 1, 2022